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15 Attorneys for Defendant
 16 GRAPH FOUNDATION, INC.

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN JOSE DIVISION

20 NEO4J, INC., a Delaware corporation,

CASE NO. 5:19-cv-06226-EJD

21 Plaintiff,

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME TO FILE
 REPLY IN SUPPORT OF MOTION TO
 STRIKE**

22 v.

Judge: Hon. Edward J. Davila
 Courtroom 4, 5th Floor

23 GRAPH FOUNDATION, INC., an Ohio
 corporation,

Action Filed: October 1, 2019
 Trial Date: None

24 Defendant.

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STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE REPLY

5:19-CV-06226-EJD

1 Pursuant to Civ. L.R. 6-2, the parties hereby stipulate to an extension of time for Plaintiff,
 2 Neo4j, Inc. (“Neo4j USA”), to file a reply in support of Neo4j USA’s Motion to Strike, but such
 3 extension will not affect the Court’s scheduled hearing date.

4 **RECITALS**

5 1. On February 7, 2020, Neo4j USA filed its Notice of Motion and Motion to Strike;
 6 Memorandum of Points and Authorities in Support thereof (“Motion”). *See* Dkt. No. 32. The
 7 hearing on the Motion is currently scheduled for May 7, 2020 at 9:00 a.m.

8 2. On February 21, 2020, Defendant, Graph Foundation, Inc. (“GFI”) filed a
 9 Memorandum of Points and Authorities in Opposition to Plaintiff’s Motion to Strike. *See* Dkt.
 10 No. 36.

11 3. Pursuant to Civ. L.R. 7-3(c), the filing deadline for Neo4j USA to file a reply in
 12 support of the Motion is currently February 28, 2020.

13 4. Neo4j USA has requested and GFI has agreed to grant an extension of time to file
 14 its reply from February 28, 2020 to March 3, 2020. The agreed-upon extension corresponds with
 15 the deadline for Neo4j USA to file its reply in support of its Motion for a Judgment on the
 16 Pleadings that is currently pending in the related case, *Neo4j, Inc. v. Purethink LLC, et al.* (Case
 17 No. 5:18-cv-07182).

18 5. Accordingly, the parties have stipulated and agreed to seek the Court’s approval
 19 of, an extension of time for Neo4j USA to file the reply in support of its Motion from
 20 February 28, 2020 to March 3, 2020.

21 6. The parties propose no change in the currently scheduled date for the hearing on
 22 the Motion, May 7, 2020, and no prior extension of time for the deadline to file Neo4j’s reply in
 23 support of the Motion has been requested.

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STIPULATION

Pursuant to Civil Local Rule 6-2, the parties, through their undersigned counsel, hereby stipulate and agree that Neo4j USA's deadline to file a reply brief in support of the Motion to Strike (Dkt. No. 32) should be extended to March 3, 2020. The hearing on the Motion would remain as previously scheduled by the Court on May 7, 2020 at 9:00 a.m.

Dated: February 25, 2020

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

Jeffrey M. Ratinoff
Attorneys for Plaintiff
NEO4J, INC.

Dated: February 25, 2020

BERGESON, LLP

By: /s/ John D. Pernick

John D. Pernick
Attorneys for Defendant
GRAPH FOUNDATION, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. Edward J. Davila
United States District Court Judge

FILER'S ATTESTATION

I, Jeffrey M. Ratinoff, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with N.D. Cal. Civil Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

Dated: February 25, 2020

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

Jeffrey M. Ratinoff
Attorneys for Plaintiff and Counter-
Defendant NEO4J, INC.